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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
CELSO MARTEARENA-ARRIOLA,)
)
Defendant.)

No. CR 08-0272 SI

**GOVERNMENT'S SECOND
SUPPLEMENTAL RULE 16 NOTICE
OF EXPERT TESTIMONY**

Trial Date: August 21, 2008
Pretrial Conf.: August 19, 2008

Pursuant to Rule 16(a)(1)(G), the government here supplements its previously-filed Notice of Expert Testimony (docket 11, filed June 13, 2008) and Supplemental Notice of Expert Testimony (docket 29, filed June 20, 2008), relating to the proposed testimony of Kenneth Woods, Senior Fingerprint Specialist with the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement (ICE), at the Forensic Document Laboratory (FDL) in McLean, Virginia.

I. ADDITIONAL FINDINGS.

Senior Fingerprint Specialist Woods recently reviewed a September 24, 1993 Santa Clara

1 County "ID Sheet" (with reference number 93 39395), that contains inked or known fingerprint
2 impressions (hereafter, "1993 Santa Clara ID Sheet"). Using the same ACE-V methodology
3 previously described in the Supplemental Notice of Expert Testimony (docket 29), Mr. Woods
4 analyzed, compared and evaluated the inked or known fingerprints on the 1993 Santa Clara ID
5 Sheet with reference to the eight previously-reviewed ICE documents described in detail in his
6 April 22, 2008 report (which was attached as Exhibit A to the Notice of Expert Testimony
7 (docket 11)).

8 Using the ACE-V methodology, Mr. Woods concluded that the inked prints on the 1993
9 Santa Clara ID Sheet have ridge characteristics and formations that are similar to, and have no
10 inexplicable dissimilarities with, the eight previously-reviewed ICE documents described in his
11 April 22, 2008 report. Mr. Woods thus determined that the prints on the 1993 Santa Clara ID
12 Sheet were made by the same individual who made the prints on the eight previously-reviewed
13 ICE documents.

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15 DATED: August 15, 2008

Respectfully submitted,

16 JOSEPH P. RUSSONIELLO
17 United States Attorney

18 _____/s/
19 TRACIE L. BROWN
20 Assistant United States Attorney
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